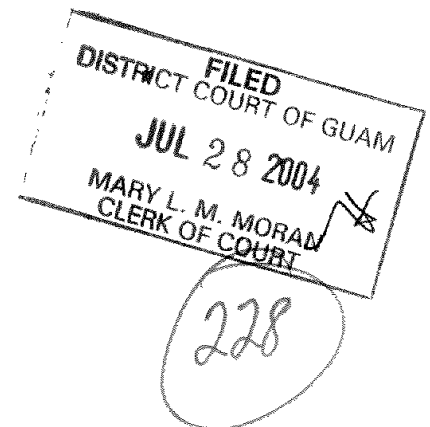


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)
SADHWANI, and K. SADHWANI'S)
INC., a Guam corporation,)
)
Plaintiffs,)
)
v.)
)
HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD.,)
et al.,)
Defendants.)
_____)

CIVIL CASE NO. 03-00036

**NOTICE OF EX PARTE
APPLICATION ON MOTION FOR
ORDER COMPELLING DISCOVERY
ON SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS**

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

NOTICE IS HEREBY GIVEN that on _____, 2004, at the hour of _____.m.,
Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will bring the
following Ex Parte Application before the Court.

ORIGINAL

Concurrently with this Ex Parte Application, HSBC has filed a Motion for Order Compelling Discovery on Second Request for Production of Documents ("Motion"). It is important and urgent that the Ex Parte Application and Motion be heard as soon as possible because Plaintiffs have failed and refused to produce documents within their possession, custody, and control which are clearly relevant to the allegations in Plaintiffs' Complaint and the discovery deadline in this case is August 17, 2004. By refusing to produce the documents requested, Plaintiffs are intentionally thwarting HSBC's attempts to prepare for depositions, dispositive motions and trial.

This Ex Parte Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in support of said Motion, and the documents on file herein all being incorporated herein by this reference. This Ex Parte Application is further supported by the Declaration of Richard A. Pipes concurrently filed herewith.

Dated this 26th day of July, 2004.

LAW OFFICES OF RICHARD A. PIPES
Attorneys for Defendant The Hongkong and Shanghai
Banking Corporation Ltd.

By: _____

RICHARD A. PIPES

RAP/nsh

